

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

*In re* Application of RICARDO BENJAMIN  
SALINAS PLIEGO & CORPORACIÓN RBA S.A.  
C.V., for an Order Pursuant to 28 U.S.C. § 1782  
Authorizing Discovery for Use in a Foreign  
Proceeding

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**RICARDO BENJAMIN SALINAS  
PLIEGO & CORPORACIÓN RBS  
S.A. de C.V. NOTICE OF  
APPLICATION AND EX PARTE  
APPLICATION FOR AN ORDER  
PURSUANT TO 28 U.S.C. § 1782  
AUTHORIZING DISCOVERY  
FOR USE IN A FOREIGN  
PROCEEDING**

Date: August 23, 2024

Time:

Courtroom: \_\_\_\_\_

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT on August 23, 2024, or as soon as the matter may be heard, before the General Duty Judge, otherwise assigned, in the Southern District of New York, 40 Foley Square, Room 2103 , New York, NY, Applicants Ricardo Benjamin Salinas Pliego (“**Salinas**”) and Corporación RBS S.A. C.V. (“**RBS**”) and (collectively the “**Applicants**”) move this Court for an Order in support of its Ex Parte Application for an Order Pursuant to 28 U.S.C. § 1782 Authorizing Discovery for Use in a Foreign Proceeding (the “**Application**”) from J.P. Morgan Chase & Co. (“**JPMC**”), Jaitegh “JT” Singh and his law firm Singh Law Firm, P.A. (collectively “**Singh**” or “**Mr. Singh**”), and Jurist IQ Corp. (“**Jurist IQ**”), for use by the Applicant in a foreign civil proceeding in the United Kingdom. Given the relief sought, Applicants may be available for a hearing, unless the Court prefers to rule on the Application without a hearing.

Concurrent with this Application, Applicants submit the enclosed Related Case Statement relating to pending action *Chenming Holdings (Hong Kong) Limited v. Sklarov et. al.*, No. 1:24-cv-00935 (S.D.N.Y. Feb. 8, 2024), and their Corporate Disclosure Statement pursuant to Local Rule 7.1.

This Application is based on this Notice of Motion and the Applicants' Memorandum of Points and Authorities, the Declaration of Eduardo Gonzalez Salceda Sanchez, the Declarations of Edward Allen as outside counsel of RBS, and any other matters as may be presented to the Court at or prior to the hearing.

Dated: August 23, 2024

Respectfully submitted,

**NELSON MULLINS RILEY & SCARBOROUGH  
LLP**

By: /s/ P. John Veysey  
P. John Veysey  
john.veysey@nelsonmullins.com  
One Financial Center, Suite 3500  
Boston, MA 02111  
Tel: (617) 217-4645 Fax: (617) 217-4710

Alan F. Kaufman  
Charles N. Hurley  
330 Madison Avenue  
27th Floor  
New York, NY 10017  
Tel: (202) 689-2890

Attorneys for Applicants  
RICARDO BENJAMIN SALINAS PLIEGO &  
CORPORACION RBS S.A. de C.V.